

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JASON J. KILBORN,)
Plaintiff,)
v.) Case No. 1:22-cv-00475
MICHAEL AMIRIDIS, CARYN A. BILLS,) Hon. John Z. Lee
JULIE M. SPANBAUER, DONALD KAMM,) Magistrate Judge Sheila M. Finnegan
and ASHLEY DAVIDSON,)
Defendants.)

**PLAINTIFF'S RESPONSE IN OPPOSITION
TO DEFENDANTS' MOTION FOR EXTENSION OF TIME**

Plaintiff, Jason J. Kilborn, now responds in opposition to Defendants' Motion for Extension of Time (Doc. No. 25) as follows:

1. On May 26, 2022, Defendants sent Plaintiff's counsel a letter accusing them of violating Rule 11 because of an email sent by Defendant Amiridis to Plaintiff on March 2, 2022. (See Ex. A). Defendants also requested a 21-day extension to file their Reply to their Motion to Dismiss.
2. On May 27, 2022, Plaintiff's counsel informed Defendants that they would not be withdrawing any part of their Response.
3. Plaintiff has since responded to Defendants' accusations. (Ex. B). Briefly stated, none of Plaintiff's statements in the Response were in any way untrue or unsupported by evidence. As outlined in Exhibit B: (1) the March 2 email came before Prof. Kilborn had even completed his mandated training; (2) Defendant Amiridis' contemporaneous email blast to the entire student body on March 4, 2022 (Ex. C) referenced only the "Cornell" portion of the training which was only the first portion of the mandated program; (3) Prof. Kilborn's repeated queries as to whether

he had satisfied the requirement of his “engagement and commitment to the goals of the program” went unanswered; and (4) Defendants had reneged on a prior agreement made by Defendant Amiridis by abruptly suspending him on December 16, 2021. (FAC ¶¶ 45, 47-49).

4. The March 4, 2022 (Ex. C) email blast confirms that Prof. Kilborn is on probation for past speech. Defendant Spanbauer told the student body that Prof. Kilborn is “scheduled” to teach two classes, and that “Oversight by the Law School administration will include review of recordings of his class sessions and...any student complaints....” Such monitoring was imposed for a reason: Prof. Kilborn is subject to another suspension or other punishment at the whim of Defendants if any of his class sessions do not fit their view of the “harassment policy.”

5. Defendants were given a 28-day extension to file their motion to dismiss; Plaintiff was given 25 days to respond. Given that Plaintiff is not withdrawing any portion of his Response, there is no basis for Defendants to need an additional 21days to file their Reply.

WHEREFORE, Plaintiff respectfully requests that Defendants’ Motion for Extension be denied.

Respectfully submitted,

/s/Paul K. Vickrey

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